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MEMORANDUM

TO: Legislative Oversight Committee Members
Local CFAC Chairs
NC Council of Community Programs
County Managers
State Facility Directors
LME Board Chairs
Advocacy Organizations
MH/DD/SAS Stakeholder Organizations

Commission for MH/DD/SAS
State CFAC
NC Assoc. of County Commissioners
County Board Chairs
LME Directors
DHHS Division Directors
Provider Organizations
NC Assoc. of County DSS Directors

FROM: Dr. Craig L. Gray
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SUBJECT: SPECIAL Implementation Update #64: Critical Access Behavioral Health Care Agencies (CABHA) and Continued Availability of Community Support Services for Case Management Functions

This special Implementation Update further defines the requirements and process to become a Critical Access Behavioral Health Care Agency (CABHA). One major change has been made in the CABHA requirements since the initial information released in Implementation Update # 63. We have heard from many consumers and providers expressing concern that the requirement to have a full-time Medical Director would be cost-prohibitive for smaller providers and would, thereby, limit consumer access to important services. We have, accordingly, revised the requirements to state that a provider serving more than seven hundred fifty consumers (750) must have a full-time Medical Director while providers serving fewer than seven hundred fifty consumers (750) may achieve certification as a CABHA with a half-time Medical Director. The attached documents also clarify that the Medical Director, either full-time or half-time, may spend up to sixty percent (60%) of their time with the CABHA engaged in the delivery of billable services, as long as all functions required of the Medical Director are completed.

We are also pleased to announce in this special Implementation Update that the Centers for Medicare and Medicaid Services (CMS) has approved our request to continue the qualified and licensed professional component of Community Support during the interim period until the new case management service definition is approved in order to provide case management services. As a result, consumers currently receiving Community Support and new consumers entering the system on or after January 1, 2010 will be able to receive the case management component of Community Support in order to ease the transition to the new case management service. Additional details on this item will be included in the regular December Implementation Update.

As we stated in Implementation Update #63, the Department of Health and Human Services (DHHS) developed this new category of provider agency for mental health and substance abuse services in an effort to move the service system toward a more clinically directed continuum of services. We very much appreciate all of the input we have received from a wide variety of stakeholders in the system – consumers and families, provider agencies and organizations, and Local Management Entities - in the development of this new provider category. We believe the attached documents reflect the benefit of that input.

The process for certifying these agencies will include staff from the Division of Mental Health, Developmental Disabilities, and Substance Abuse Services (DMH/DD/SAS), the Division of Medical Assistance (DMA), and the local management entities (LME). The documents identified below are attached and provide a more detailed overview of the requirements and certification process.

- CABHA – update of the information found in Implementation Update #63 that defines the goals and key requirements of a CABHA agency. Please note the services an agency may provide have been updated.
- CABHA Review Process - outlines the elements of the review process that includes two steps: desk and onsite review.
- CABHA Review Flow Chart – flowchart of review process.
- Letter of Attestation – primary document the provider will submit if seeking certification as a CABHA. Also, identifies the additional documentation that must be submitted for the desk review.
- Letter of Intent – letter that may be submitted to indicate the intent to pursue CABHA certification, if not yet ready to submit the letter of attestation.
- CABHA Standardized Letter – standardized letter sent to the provider after completion of the desk review.
- Desk Review – tool that will be used to guide the desk review of the attestation letter and supporting documentation submitted.
- On-site Review – tool that will be used to guide the staff interviews and onsite review.
- Letter of Notification – standardized letter that informs the provider of the certification decision.

Providers who wish to pursue the CABHA certification shall electronically submit a letter of attestation signed by the CEO of the agency and supporting documentation to the LME Systems Performance Team at Contact.DMH.LME@dhhs.nc.gov. Letters of attestation will be accepted beginning December 1, 2009. Because of the time restrictions on agencies providing Community Support Team (CST), Intensive In-Home (IIH), and Day Treatment, submissions from provider agencies currently delivering those services will be processed first.

Agencies that do not currently meet the minimum staffing requirements (Medical Director, Clinical Director, and Quality Improvement/Training Director) must have those positions actively in place for a minimum of two months before the onsite review can be conducted. The goal of the onsite review is to verify the integration of these key positions into the agency infrastructure as it relates to their roles and responsibilities for clinical oversight and quality assurance.

We have heard some misinformation and confusion surrounding some of the CABHA requirements. We understand this is a significant change for the system, though we strongly believe it is a change that will improve the quality of care for the people we serve. We encourage you to carefully review the attached documents, which we believe will help to clarify many of these issues.

Unless noted otherwise, please email any questions related to this Implementation Update to ContactDMH@dhhs.nc.gov.

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